

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JASON DOUGLAS, individually and on)	
behalf of all others similarly situated,)	Case No. 14-cv-1741
)	
Plaintiff,)	Hon. Gary Feinerman
)	
v.)	Hon. Jeffrey Cole
)	
THE WESTERN UNION COMPANY,)	
a Delaware corporation,)	
)	
Defendant.)	

PLAINTIFF’S MOTION FOR LEAVE TO FILE DOCUMENT UNDER SEAL

Pursuant to Local Rule 26.2, Plaintiff Jason Douglas (“Plaintiff”), by and through his undersigned counsel, Siprut PC, hereby moves for leave to file a portion of Plaintiff’s Reply In Support Of Motion For Leave For Discovery From Objectors under seal. In support of this motion (the “Motion”), Plaintiff states:

1. On March 3, 2016, Plaintiff filed his Motion For Leave For Discovery From Objectors. (Dkt. 72.)
2. At the March 10, 2016, presentment hearing of that motion, this Court directed Plaintiff to include in his reply brief support for Plaintiff’s statement that objector Bethany Price (“Price”) was “involved in several crimes.” (See Dkt. 72 ¶6.)
3. In his reply brief, Plaintiff discusses a background report on Price and attaches selected portions the report as Exhibit C thereto.
4. Due to the sensitive nature of information contained in the report, Plaintiff seeks leave to file portions of his reply brief and Exhibit C thereto under seal.

WHEREFORE, Plaintiff respectfully requests this Court enter an order:

- A. Granting this motion;
- B. Permitting Plaintiff to file portions of pages 1 and 2 of and Exhibit C to Plaintiff's Reply In Support Of Motion For Leave For Discovery From Objectors under seal; and
- C. Granting such further relief this Court deems equitable and just.

Dated: March 15, 2016

Respectfully submitted,

By: /s/ Joseph J. Siprut

Joseph J. Siprut
jsiprut@siprut.com
Ismael T. Salam
isalam@siprut.com

SIPRUT PC
17 N. State Street, Suite 1600
Chicago, Illinois 60602
312.236.0000
Fax: 312.878.1342

*Counsel for Plaintiff
and the Settlement Class*

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that a true and correct copy of the foregoing **Plaintiff's Motion For Leave To File Document Under Seal** was filed this 15th day of March 2016 via the electronic filing system of the Northern District of Illinois, which will automatically serve all counsel of record, and was sent this 15th day of March 2016 to the following via FedEx, next business day delivery:

John Knott
c/o C. Jeffrey Thut, Esq.
Noonan, Perillo & Thut
25 N. County Street
Waukegan, IL 60085

Bethany Carol Price
c/o W. Allen McDonald, Esq.
249 N. Peters Road, Suite 101
Knoxville, TN 37923

Pamela A. Sweeney, Pro Se
2590 Richardson Street
Madison, WI 53711

Patrick A. Sweeney, Pro Se
2590 Richardson Street
Madison, WI 53711

/s/ Joseph J. Siprut